

1 DANIEL G. BOGDEN
United States Attorney
2 District of Nevada
Nevada Bar No. 2137
3 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
4 Nevada Bar No. 1925
United States Attorney's Office
5 333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
6 Telephone: 702-388-6336
Facsimile: 702-388-6787
7 Email: Daniel.Hollingsworth@usdoj.gov
Attorneys for the Federal Defendants and the United States
8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**
11

12 FRANCES M. WEEKS-ANDEREGG,)
13 Plaintiff,)
14 v.) 2:13-CV-00610-GMN-(VCF)
15 UNITED STATES OF AMERICA; CIVIL AIR)
PATROL FOUNDATION, INC., an Alabama)
16 Domestic Non-Profit Corporation d/b/a CIVIL)
AIR PATROL, INC.; DOES I-XV, inclusive;)
17 and ROE BUSINESS ENTITIES I-XV,)
inclusive,)
18 Defendants.)
19

20 **UNITED STATES OF AMERICA'S UNOPPOSED MOTION TO EXTEND TIME**
21 **TO FILE REPLIES TO OBJECTION TO SUBSTITUTION OF UNITED STATES**
22 **OF AMERICA AS DEFENDANT (ECF NO. 10), PLAINTIFF'S OPPOSITION TO**
23 **MOTION TO STAY DISCOVERY (ECF NO. 11), and PLAINTIFF'S OPPOSITION**
TO MOTION TO DISMISS (ECF NO. 12)
(First Request)

24 The United States of America ("United States"), by and through Daniel G. Bogden, United States
25 Attorney for the District of Nevada, and Daniel D. Hollingsworth, Assistant United States Attorney,
26 respectfully moves this Honorable Court for an Order extending the time for the United States to file a

1 responsive pleading pursuant to Fed. R. Civ. P. 6(b), LR 6-1, and LR 6-2. The deadline to file the
2 Replies is currently May 6, 2013. The United States requests to and including May 27, 2013, to file the
3 Replies. This is the first request for an extension. The grounds for extending the time are as follows.

4 The attorney for the Air Force, who is assigned to this case and works with the undersigned
5 counsel, is unavailable until May 21, 2013, because of medical and personal reasons. Many pleadings
6 have been filed in numerous criminal cases that require the undersigned counsel to respond, and seven
7 civil cases require immediate attention because of recent deadlines imposed. Undersigned counsel cannot
8 meet all of the deadlines in these cases and requests extensions of time. The United States needs
9 additional time to contact the appropriate components of the Air Force and the Civil Air Patrol to
10 determine the facts and prepare the Replies accordingly. The United States requests this Court allow the
11 United States to and including May 27, 2013, to file the Replies.

12 On April 30, 2013, undersigned counsel for the United States contacted Robert S. Cardenas,
13 counsel for Plaintiff, who did not object to and agreed to these extensions of time.

14 This motion is not submitted solely for the purpose of delay or for any other improper purpose.
15 Pursuant to Fed. R. Civ. P. 6(b), LR 6-1, and LR 6-2 and based on the forgoing reasons, the United States
16 respectfully requests an extension of time to and including May 27, 2013, to file the Replies.

17 DATED this 1st day of May, 2013.

18 DANIEL G. BOGDEN
United States Attorney

19 /s/ Daniel D. Hollingsworth
20 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

21
22 IT IS SO ORDERED:

23 
24 UNITED STATES ~~DISTRICT~~ JUDGE

25 DATED: 5-20-2013

PROOF OF SERVICE

I, Daniel D. Hollingsworth, certify that the following individuals were served with copies of
**UNITED STATES OF AMERICA’S UNOPPOSED MOTION TO EXTEND TIME TO FILE
REPLIES TO OBJECTION TO SUBSTITUTION OF UNITED STATES OF AMERICA AS
DEFENDANT (ECF No. 10), PLAINTIFF’S OPPOSITION TO MOTION TO STAY
DISCOVERY (ECF No. 11), and PLAINTIFF’S OPPOSITION TO MOTION TO DISMISS (ECF
No. 12) (First Request)** on May 1, 2013, by the below identified method of service:

CM/ECF:

John L. Bertoldo
Robert S. Cardenas
BENSON, BERTOLDO, BAKER & CARTER
7408 West Sahara Avenue
Las Vegas, Nevada 89117
JBERTOLDO@BBBC-LAW.COM
kim@benzonlawyers.com
Attorneys for Plaintiff

/s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney